

EXHIBIT C

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December 4, 2015

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VIA EMAIL AND FIRST CLASS MAIL

Helen Davis Chaitman (hchaitman@chaitmanllp.com)
Leslie Treff (ltreff@chaitmanllp.com)
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465 Park Avenue
New York, NY 10022

Re: Adv. Pro. No. 10-04898 (SMB); *Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC v. Helene Saren-Lawrence*; In the United States Bankruptcy Court for the Southern District of New York.

Dear Counsel:

Enclosed for your consideration and execution is a Stipulation as to Undisputed Transfers with attached Declaration. Your client's execution of the Declaration will enable the parties to significantly streamline discovery.

Please notify us in no later than two weeks if Defendant will execute the Declaration. If Defendant executes the Declaration, we will not serve additional Rule 45 subpoenas on financial institutions related to relevant accounts.

Should you have any questions, please feel free to contact me or Rachel M. Smith at (713) 646-1386.

Regards,



Dean D. Hunt

Enclosures

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

HELENE SAREN-LAWRENCE,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04898 (SMB)

STIPULATION AS TO UNDISPUTED TRANSFERS

The plaintiff, Irving H. Picard, trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities (“BLMIS”) and the estate of Bernard L. Madoff, individually (“Madoff”), and defendant Helene Saren-Lawrence (“Defendant”), by and through their respective, undersigned counsel (collectively, the “Parties”), state as follows:

WHEREAS, as set forth in the Trustee’s Complaint in this adversary proceeding, BLMIS or Madoff made certain initial transfers to or for the benefit of Helene Saren-Lawrence, relating to an account held at BLMIS or with Madoff (the “Initial Transfers”);

WHEREAS, the Trustee seeks to avoid and recover the Initial Transfers or their value as fraudulent;

WHEREAS, Defendant raises certain defenses to the Trustee’s claims in the Complaint; and

WHEREAS, the Parties are entering into this Stipulation in the interest of efficiency with respect to this Adversary Proceeding;

NOW, THEREFORE, the Parties stipulate as follows:

1. Defendant will execute the Declaration of Helene Saren-Lawrence, attached hereto as Exhibit 1 (the “Declaration”).
2. Upon execution of the Declaration and this Stipulation, the Trustee will not serve additional Rule 45 subpoenas on financial institutions and will withdraw all previously served, but not yet answered, subpoenas on financial institutions that received funds from BLMIS or Madoff related to the account that is the subject of this Adversary Proceeding.

3. By executing this Stipulation, Defendants do not concede or admit liability and the Trustee does not waive any claims under Bankruptcy Code sections 548, 550, or any other applicable section of the Bankruptcy Code, SIPA, or any other applicable law.

4. This Stipulation is without prejudice to the Trustee asserting claims to avoid or recover any additional or other transfers to Defendant or any other person or entity, including any subsequent transfers of the Initial Transfers, determined through the Trustee's continuing investigation and through discovery.

5. This Stipulation is without prejudice to the Defendant to oppose any further claims asserted by the Trustee with respect to additional or other transfers described in paragraph 4 above.

Dated: New York, New York
_____, 2015

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Securities LLC and the Estate of Bernard L.
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Attorneys for Defendant Helene Saren-Lawrence

Exhibit 1

DECLARATION OF HELENE SAREN-LAWRENCE REGARDING ACCOUNT NO. 1ZA620

I, Helene Saren-Lawrence, declare:

1. My name is Helene Saren-Lawrence. I am over the age of twenty-one (21). I am under no legal disability and I am fully competent to make this Declaration.
2. I maintained investment advisory Account No. 1ZA620 with Bernard L. Madoff Investment Securities LLC.
3. I was the only person or entity who made deposits into or withdrawals from Account No. 1ZA620.
4. I opened Account No. 1ZA283 on or around December 16, 1992 with a deposit of \$600,000.00.
5. Including the initial deposit referenced in Paragraph 4 above, I deposited a total of \$893,291 into Account No. 1ZA620 by November 23, 2007. No other deposits were made into Account No. 1ZA620.
6. In total, I withdrew \$1,608,000.00 from Account No. 1ZA620.
7. The total amount I had withdrawn from Account No. 1ZA620 as of April 9, 1998 equaled \$1,005,000.00.
8. The last withdrawal from Account No. 1ZA620 occurred on or around August 27, 2008, when I withdrew \$50,000.00.
9. I withdrew \$261,000.00 from Account No. 1ZA620 between December 11, 2006 and the date of the last withdrawal.

Dated: New York, New York
_____, 2015

Helene Saren-Lawrence